pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT

NPDES COMPLIANCE INSPECTION REPORT

NPDES Permit No.	Mo/Day/Yr	Entry Time	Exit Time	Inspection Type	eFACTS Inspection ID
PA0044741	7/9/2020	09:00		CEI	

Facility Name:	Permittee Name:
Hanover Foods IWTP	Hanover Foods Corporation

Physical Location/Directions:	Permit Expiration Date:
1550 York Street, Hanover, PA 17331	09/30/2020

Municipality:	County:	Permit Renewal Application Due:
Penn Township	York	03/31/2020

Facility Type: ☐ Sewage ■ Industrial Waste ☐ Industrial Stormwater ☐ Other:
☐ Major ■ Minor

Responsible Person:	Certified Operator Required: ☐ Yes ■ No
David Still	Certified Operator in Responsible Charge:
Title: Vice President - Operations	Eric Eckersley
Permittee Address: PO Box 334 1486 York Street Hanover, PA 17331	Client ID: Class-Subclass(es): Circuit Rider: ☐ Yes ■ No
Business Phone: 717.632.6000 Fax: Email: dstill@hanoverfoods.com	Business Phone: 717.632.6000 xt 1214 Cell: Email: eeckersley@hanoverfoods.com

24-Hour Emergency Contact Person / Phone:

VIOLATIONS: (list below) ■ Yes ☐ No ■ Pending Sample Results

Short circuiting, rising sludge, and solids discharge from IWTP clarifiers #3 & #4 are a violation of Part B.I.D of your NPDES Permit No. PA0044741. Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance

Person Interviewed:	Date:	Inspector:	Date:
Eric Eckersley	07/09/2020	Austen Randecker	7/9/2020
Signature:	Phone No.: 717.632.6000	Inspector Signature:	Phone No.: 717.503.7121
Title: Operator		Title: Water Quality Specialist	
Email: eeckersley@hanoverfoods.com		Email: arandecker@pa.gov	

This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records.

NPDES COMPLIANCE INSPECTION REPORT

Comments
A Compliance Evaluation Inspection was conducted today by the Department's Clean Water Program. In attendance for the inspection was Austen Randecker (Water Quality Specialist). I was met on-site Eric Eckersley (Plant Operator) and Kumar Navile (Environmental Affairs & Sustainability Manager) who accompanied me on the inspection.
Treatment plant receives industrial wastewater from canning operations as well as NCCW. Industrial wastewater is treated as a pre-treatment operation for Penn Township STP (450,000 gallons/day monthly average). NCCW is treated and discharged to Oil Creek at Outfall 001. Industrial Wastewater that is not sent to Penn Township is combined with the NCCW, treated and discharged at Outfall 001.
Influent flow from industrial canning operations passes through screening before entering the grit removal chamber. Once removed or grit and screenings, influent enters the wet well equipped with 3 influent pumps and one surge pump. During periods of high flows or heavy BOD loadings an EQ/Surge tank can be put online to store extra flow and can be fed back to the wet well by a flow metering device in the screening area. Influent samples are collected for weekly testing and for daily COD. The Surge tank was online during the inspection. The Surge tank is equipped with a mixer and is continuously mixed.
There were some food particles on the ground surface near the screening building. Mr. Eckersley stated that the screening area is cleaned daily. Screenings are collected in trucks and stored in the residual storage pad for land application. Other clippings and food waste products are kept on the storage pad. The storage pad is fully covered and sloped to a drain system that collects any runoff from the screenings/food waste. This runoff is gravity fed to a sump pump at the slurry tank that is directly pumped into the influent line before the screening devices.
After screening and grit removal industrial waste is pumped to 1 of 2 bio-reactors via 3 influent wet well pumps. Bio-reactor #2 was online during the inspection. Bio-reactor #1 and clarifiers 1 and 2 were offline due to maintenance and chemical feed repairs. Reactor #1 is currently operating at 93.3 degrees F and is designed to operate at ~95 degrees F. Mr. Eckersley states that heat exchanger may not be sufficient enough to maintain design temperature, there has been discussion of installing a heat exchanger on the IW/NCCW lines to help aide the temperature in the bio-reactor. The reactor has ability to flare gas, normal operations use the gas as fuel for the heat exchanger. A natural gas line is to be installed in the future, it will be used as a fuel source to maintain temperature in the bio-reactors.
Flow from bio-reactor #2 is fed to a splitter box that diverts flow between primary clarifier 3 and 4, both online during the inspection. Clarifiers 3 and 4 are experiencing short-circuiting, gas release, and solids carry over in multiple areas along the weirs. There is some minor algae accumulation in the effluent weir notches. RAS from the clarifiers is sent to a RAS pit. There is a valve in the RAS pit that is used to waste sludge. Wasted sludge is sent to the Slurry tank and ultimately is land applied. Effluent from clarifier 3 and 4 is gravity fed to aeration lagoon #1.

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Comments
Lagoon #1 appeared to be a brown/green color and there were no significant odors, scum, or floatables. The liner appears to be in good repair. Lagoon #1 is equipped with 3 diffuser barges, 1 surface aerator, and 4 pontoon aerators. Effluent from lagoon #1 is sampled and is the majority is sent to Penn Township WWTP for final treatment. A new flow isolation gate valve was recently installed on lagoon #1 for flow being sent to Penn Township WWTP. Flow from lagoon #1 that is not sent to Penn Township WWTP is fed into lagoon #2.
Lagoon #1 was drained about 4-5 feet from the last inspection so the lagoon can be cleaned. Solids are being removed from the bottom of the lagoon and are being placed into 2 Geo-bags that are located just to the south of lagoon 1. Solids are pumped into the geo-bags to be dewatered. The runoff from the geo-bags is sloped and directed back into lagoon 1. The geo-bags are currently in the final drying stage and will be removed off-site once the drying process is completed.
NCCW is also treated on-site. NCCW flow, and some of lagoon #1 effluent enters aeration lagoon #2. Lagoon #2 appeared mostly clear and had a green/brown tint. No rips/tears were noted with the liner. Lagoon #2 is equipped with 3 diffuser barges, 1 surface aerator, and 4 pontoon aerators. 1 pontoon aerator was offline during the inspection. Flow from lagoon #1 is gravity fed to a splitter box where flow is diverted to 2 polishing ponds. The polishing ponds were being aerated during the inspection. The water in the polishing ponds appeared clear with a green tint. There were some scum and solids on the surface.
Effluent from the polishing ponds is combined and sent to UV disinfection before being discharged to Oil Creek at Outfall 001. There are two UV units, bank 2 was online during the inspection. The UV units are alternated. The UV system has a PLC and SCADA that can be viewed and operated from the control building. Effluent composite samples are collected from the effluent line post UV disinfection. Flow from the UV unit is gravity fed to Outfall 001. The outfall was clear of debris and no observable solids, foam, or scum was noted at the headwall. Effluent appeared to have a greenish/yellow tint with some observable solids. Oil Creek upstream and downstream of the outfall appeared clear. Effluent flow from Outfall 001 during the inspection was 322 gallons/minute.
Recommendations:
-Notify the Department when Bio-reactor 1 and Clarifiers 1 and 2 are operational and online
-Cleanup and housekeeping of screening area, residual waste storage pad, and slurry tank
-Sampling NCCW influent 1/week for process control
-Adjusting wasting rates/transfer from clarifiers to slurry tank
-Notify the Department of conducting any temperature changes within the Bio-reactor
-Updating the Emergency Response /PPC Plan and reviewing/revising on a yearly basis

NPDES COMPLIANCE INSPECTION REPORT

Monitoring, Reporting and Recordkeeping
(NPDES Permit Part A)

On-site laboratory: ■ Registered ☐ Accredited ☐ N/A ☐ Not Registered/Accredited

On-site analyses: ■ pH ■ DO ■ TRC ☐ All NPDES parameters ☐ None

■ Other(s): Temperature

DEP Lab Registration/Accreditation #: 67-01061 Lab Supervisor:

Comments:

Contract Laboratory Name: ALS Environmental DEP Lab Accreditation #: 22-00293

Address & Phone: 301 Fulling Mill Road, Middletown

Parameters Analyzed: color, CBOD, TSS, O/G, fecal, NH3-N, Total Phos, Total Cadmium, Total nitrogen series

Comments:

Sample Collection: Influent sampling location: before bio-reactors

Effluent sampling location: Post UV system

Location(s) adequate for representative samples:	■ Yes	☐ No
Parameters analyzed, sample frequencies and sample types meet permit requirements:	■ Yes	☐ No
Samples properly preserved during collection, storage and shipping:	■ Yes	☐ No
Sampler or sample temperature is recorded using NIST traceable thermometer:	■ Yes	☐ No

Comments:

Composite samples: Being collected: ■ Yes ☐ No Composites are: ☐ 8-hour ■ 24-hour ☐ Other

Samples are: ☐ Flow Proportional ■ Time Proportional

Sampler controlled by: ■ Influent flow meter ■ Effluent flow meter

Minimum aliquot volume greater than 100 ml: ■ Yes ☐ No

Composite sampler temperature during inspection: 6C

Comments:

Sample records: Available for inspection: ■ Yes ☐ No Retained for at least three years: ■ Yes ☐ No

Includes: Collector name: ■ Yes ☐ No Collection date/time: ■ Yes ☐ No Collection location: ■ Yes ☐ No

Analyst name: ■ Yes ☐ No Analysis date/time: ■ Yes ☐ No Analysis Results: ■ Yes ☐ No

Analytical methods & quantitation limits: ■ Yes ☐ No Chain-of-Custody forms: ■ Yes ☐ No

Comments:

Bench sheets: Data is consistent with data on the DMR: ■ Yes ☐ No ☐ N/A Month(s)/year checked: September 2019

Comments:

Field Testing: Completed within required hold time: ■ Yes ☐ No

Equipment is calibrated as required: pH: ■ Yes ☐ No DO: ■ Yes ☐ No TRC: ■ Yes ☐ No ☐ N/A

Other(s): ☐ Yes ☐ No

Calibration records maintained: ■ Yes ☐ No

Comments:

DMR Submittal: DMRs are submitted as required: ■ Yes ☐ No eDMR User: ■ Yes ☐ No

DMR Supplemental Reports are submitted as required: ■ Yes ☐ No

DMRs include all sample results collected and analyzed using approved methods: ■ Yes ☐ No

Comments:

NPDES COMPLIANCE INSPECTION REPORT

Flow Measurement
(NPDES Permit Part A)

Primary flow meter and recorder: Operable: ■ Yes ☐ No Properly maintained: ■ Yes ☐ No
Measuring device type: ☐ Flume ☐ Weir ■ Full Pipe ☐ Open Channel ☐ Other:
Meter type: ☐ Ultrasonic ■ Magnetic Meter ☐ Bubbler ☐ Other:
Meter location: Post UV system
Recorder type: ■ Totalizer ☐ Daily Chart ☐ 7-Day Chart ■ SCADA/Electronic ☐ Other:
Capable of recording maximum flows: ■ Yes ☐ No Calibration Range: unknown
Inspection frequency: ■ Daily ☐ Weekly ☐ Other:
Calibration frequency: 2/year Date of last calibration: 07-01-2020
Measuring device, meter and recorder included as part of flow meter calibration: ■ Yes ☐ No ☐ N/A
Influent flow is measured before all return lines: ■ Yes ☐ No Influent flow is measured after hauled-in wastes: ☐ Yes ☐ No
Effluent flow is measured after all withdraws: ■ Yes ☐ No
Comments:

Flumes: Flow is uniform across the channel: ☐ Yes ☐ No ■ N/A Flume is free of debris and deposits: ☐ Yes ☐ No ■ N/A
Comments:

Weirs: Clean with a visible air space below the nappe: ☐ Yes ☐ No ■ N/A
Comments:

Treatment Plant
(NPDES Permit Part B)

Treatment plant bypass: Since last inspection: ☐ Yes ■ No Reported to DEP: ☐ Yes ☐ No
Location/cause:

Major equipment repair/replacement: Since last inspection: ☐ Yes ☐ No Date of last inspection: CEI on 7/20/16
Repair List: grit belt

Stand-by power: ■ Emergency generator ☐ Dual power feed ☐ None ☐ Other:
System operable: ■ Yes ☐ No Exercise frequency: weekly Maintenance frequency: annual
Comments: Emergency generator is available for the wet well; there is no backup power at the treatment plant

Alarms: Type: ☐ None ■ SCADA ☐ Auto Dialer ☐ PLC ■ Other: light alarm
System operable: ■ Yes ☐ No Test frequency:
Alarm triggers: high/low levels

Staffing schedule: ☐ 24/7 Weekday hours: 0500 to 1500 Weekend/Holiday hours: Varies
Other:

On site Logs: Logs up-to-date: ■ Yes ☐ No ☐ N/A
Daily Log contains: ☐ Visual observations ■ Process adjustments ■ Problems and concerns
Repair log maintained: ■ Yes ☐ No Routine maintenance log maintained: ■ Yes ☐ No
Comments: Repair and maintenance included in daily log

Spare parts inventory: maintained: ■ Yes ☐ No ■ Standby units available
Comments:

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Treatment Process Units
(NPDES Permit Part B)

Water Quality Management Permit No. | All treatment units are as noted in permit: ☐ Yes ☐ No

Treatment Units	Total	On-Line	Inoperable	Comments
Screening	1	1		
Grit Removal	1	1		
Surge Tank (EQ)	1	1		
Bio-reactor	2	1	0	Reactor #1 offline for maintenance
Primary Clarifier	4	2	0	#1 and #2 offline for maintenance
Aeration Lagoons	2	2		
Polishing ponds	2	2		
UV System	2	1	0	Two UV units that alternate
Residual Storage Pad	1	1		Under roof cover
Slurry Tank	1	1		Valve has been replaced; currently no leaks

Chemical Additions: MgOH, sulfuric acid, PAC, Polymer, biological bug supplement

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Process Control
(NPDES Permit Part B)

Frequency of Testing	Current Testing Results
■ Settleability	1000
■ Dissolved Oxygen	Lagoon 2: West: 4.8, North: 5.0, East: 5.0. South: 5.4
■ Sludge Blanket	#3: 9ft; #4: 11 ft – 07/09
■ Mixed Liquor Suspended Solids ☐ MLVSS	Digester #2: 4940 – 07/09
☐ Microscopic exam of MLSS	
■ Color ☐ Odor	Comments/observations/results: Lagoon 1 appeared to be a green/brownish color; Lagoon 2 appeared clear with a green tint
■ Other: Digester 2: pH: 6.98; Alkalinity: 350	

Other Requirements
(NPDES Permit Part C)

Special Conditions: Next submission/action: Due Date:

☐ WETT:

☐ TRE/TIE:

☐ EPA Pretreatment Program ☐ Annual report submitted:

■ Stormwater requirements: sampling at 002 and 003

☐ Permit Schedule:

☐ TMDL:

■ Other: C-Bay nutrient monitoring

Comments:

Emergency Response/PPC Plan: on-site: ■ Yes ☐ No ☐ N/A Last updated: 02/2016

Flood response plan available: ☐ Yes ☐ No ■ N/A

Comments:

Compliance History

History of noncompliance: with discharge effluent limits: ■ Yes ☐ No

Recent Compliance Actions: ■ Yes ☐ No

Comments:

Legal Agreement: Consent Order and Agreement, Consent Decree or Order: ■ Yes ☐ No Date executed: 01/03/2017

In compliance with legal agreement: ☐ Yes ■ No

Obligations due next: Quarterly reports

Comments:

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Effluent/Receiving Water Evaluation

Outfall Number(s): 001 | **Stream Name:** Oil Creek

DEP Collector #: 2660-072
Sample Date/Time: 7/9/2020 @ 11:20
Sample Location: post UV unit

Field Measurements:	Upstream	Outfall	Downstream	Units
Flow		322		GPM
pH		8.04		S.U.
Conductivity				µmhos/cm
Dissolved Oxygen		7.20		mg/L
Total/Free Chlorine Residual				mg/L
Temperature		31.5		°C

Upstream Observations: Clear

Outfall Observations: Clear; no erosion and free of debris; effluent appeared slightly cloudy

Downstream Observations: Clear

Outfall Number(s): | **Stream Name:**

DEP Collector #:
Sample Date/Time:
Sample Location:

Field Measurements:	Upstream	Outfall	Downstream	Units
Flow				MGD
pH				S.U.
Conductivity				µmhos/cm
Dissolved Oxygen				mg/L
Total/Free Chlorine Residual				mg/L
Temperature				°F

Upstream Observations:

Outfall Observations:

Downstream Observations:

Outfall Number(s): | **Stream Name:**

DEP Collector #:
Sample Date/Time:
Sample Location:

Field Measurements:	Upstream	Outfall	Downstream	Units
Flow				MGD
pH				S.U.
Conductivity				µmhos/cm
Dissolved Oxygen				mg/L
Total/Free Chlorine Residual				mg/L
Temperature				°F

Upstream Observations:

Outfall Observations:

Downstream Observations: